

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY**

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In the Matter of the Application of)
CommuniGroup of Jackson, Inc.)
for Certificate of Public Convenience)
and Necessity to Provide Facilities-Based)
and Resold Local Exchange)
Telecommunications Services in the)
State of Tennessee)

Case No. 03-00072
TN REGULATORY AUTHORITY
RECEIVED ROOM

ORIGINAL

REQUEST FOR MOTION FOR PROTECTIVE ORDER
OF COMPANY FINANCIAL INFORMATION

In the matter of consideration of the Application of CommuniGroup of Jackson, Inc. ("CommuniGroup" or "Applicant") for the provision of local telecommunications services in the State of Tennessee, Applicant respectfully submits this Request for Motion for Protective Order. It is anticipated that Applicant may designate certain documents and information to be subject to varying degrees of confidentiality and exempt from public disclosure.

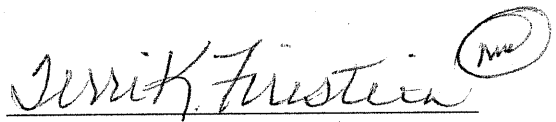
A redacted Application for a Certificate of Public Convenience and Necessity has been filed under the rules and regulations of the Tennessee Regulatory Authority. The financial information has been removed from the Application and attached as part of this filing as complete and final.

Applicant does not argue that the Tennessee Regulatory Authority needs to review financial information for approval of the Certificate of Public Convenience and Necessity. However, the information requested by the Tennessee Regulatory Authority is commercial information that would allow competitors to determine the financial strength

of the Applicant. In addition, the information could be used to the competitive advantage of potential competitors, which would harm the position of the Applicant.

The Tennessee Regulatory Authority has established itself as a promoter of fair and equitable competition. Applicant considers public disclosure of its financial information as a violation of trade secrets, thereby providing competitors an advantage in the telecommunications market. Therefore, Applicant respectfully requests the approval of this motion for protection of public disclosure of company confidential financial information.

Respectfully Submitted,

A handwritten signature in cursive script, reading "Terri K. Firestein". To the right of the signature is a small, circular handwritten mark that appears to be the initials "TF".

Terri K. Firestein, Consultant to
CommuniGroup of Jackson, Inc.